

Ramon Rossi Lopez - rlopez@lopezmchugh.com
(California Bar Number 86361; admitted *pro hac vice*)
Lopez McHugh LLP
100 Bayview Circle, Suite 5600
Newport Beach, California 92660
949-812-5771

Mark S. O'Connor (011029) – mark.oconnor@gknet.com
Gallagher & Kennedy, P.A.
2575 East Camelback Road
Phoenix, Arizona 85016-9225
602-530-8000

Co-Lead/Liaison Counsel for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability Litigation

No. 2:15-MD-02641-DGC

**PLAINTIFFS' EX PARTE REQUEST TO
AMEND CASE MANAGEMENT ORDER
NO. 6, SECTION VI QUARTER
REPORTS OF THE COURT**

(Assigned to the Honorable David G.
Campbell)

Plaintiffs, through co-lead counsel, hereby request the Court to amend Section VI of Case Management Order No. 6 to allow Plaintiffs to submit reports on a bi-annual basis regarding fees and expenses submitted by various Plaintiffs' counsel for eventual reimbursement from the common fund in this case.

As the Court is aware, the parties have been involved in bellwether trials during the year 2018. The Plaintiffs' counsels submitting requests for fees and expenses has been primarily related to the bellwether trials. Plaintiffs have consulted with Judge Corodemus, Special Master who has been responsible for reviewing attorneys' fees and submitting the reports. Judge Corodemus has agreed and Plaintiffs believe that in the interest of economy, a bi-annual report beginning at the end of the second week of November 2018

1 will effectively serve the purpose of providing the Court with reports to review attorneys'
2 fees incurred for various categories of work in the cases.

3 Accordingly, Plaintiffs request that the Court amend CMO 6, Section VI to provide
4 that the reports required by that section be due every six months commencing the end of
5 the second full week of November 2018.

6

7 RESPECTFULLY SUBMITTED this 17th day of August, 2018.

8

GALLAGHER & KENNEDY, P.A.

9

10 By: /s/ Mark S. O'Connor
11 Mark S. O'Connor (011029)
2575 East Camelback Road
Phoenix, Arizona 85016-9225

12 Ramon Rossi Lopez
13 (admitted *pro hac vice*)
14 CA Bar No. 86361
LOPEZ McHUGH LLP
100 Bayview Circle, Suite 5600
Newport Beach, California 92660
15 *Attorneys for Plaintiff Carol Kruse*

16

17

18

19

20

21

22

23

24

25

26

27

28

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of August, 2018, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Jessica Gallentine

6751152v1/26997-0001